

Exhibit C

From: Zimmerman, Robert <rzimmerman@smbb.com>
Sent: Thursday, March 21, 2024 3:29 PM
To: Dennison, Kristen E.; Guevara, Camila; LPJUKSIG
Cc: SMBSIG
Subject: RE: Hall v. Sig Sauer- Pltfs 3rd and 4th Discovery Requests

Ok. No meet and confer. We'll address with the Court.

Robert W. Zimmerman, Esq.

Partner



One Liberty Place
1650 Market Street, 52nd Floor
Philadelphia, PA 19103
[215-575-3898](tel:215-575-3898) (work) [267-872-3430](tel:267-872-3430) (cell)
<https://www.smbb.com/attorney/robert-w-zimmerman/>

From: Dennison, Kristen E. <kristen.dennison@littletonjoyce.com>
Sent: Thursday, March 21, 2024 3:28 PM
To: Zimmerman, Robert <rzimmerman@smbb.com>; Guevara, Camila <cguevara@smbb.com>; LPJUKSIG <LPJUKSIG@littletonpark.com>
Cc: SMBSIG <smbsig@smbb.com>
Subject: RE: Hall v. Sig Sauer- Pltfs 3rd and 4th Discovery Requests

As set forth below, we agreed in the joint case management plan to 30 interrogatories, which is already 5 more than allowed by the rules. Sig objects to any more interrogatories.

Kristen E. Dennison
Partner
Direct Dial (321) 574-1054 • Mobile (646) 708-4844
kristen.dennison@littletonjoyce.com

Please note: To reduce the quantity of paper coming into our offices, we request that as many communications as possible be through electronic means. Your cooperation is appreciated.

From: Zimmerman, Robert <rzimmerman@smbb.com>
Sent: Thursday, March 21, 2024 3:26 PM
To: Dennison, Kristen E. <kristen.dennison@littletonjoyce.com>; Guevara, Camila <cguevara@smbb.com>; LPJUKSIG <LPJUKSIG@littletonpark.com>
Cc: SMBSIG <smbsig@smbb.com>
Subject: RE: Hall v. Sig Sauer- Pltfs 3rd and 4th Discovery Requests

Kristen, we can remove "renewed" if you like. If you'd like a "new" meet and confer, let us know.

Robert W. Zimmerman, Esq.

Partner



One Liberty Place

1650 Market Street, 52nd Floor

Philadelphia, PA 19103

[215-575-3898](tel:215-575-3898) (work) [267-872-3430](tel:267-872-3430) (cell)

<https://www.smbb.com/attorney/robert-w-zimmerman/>

From: Dennison, Kristen E. <kristen.dennison@littletonjoyce.com>

Sent: Thursday, March 21, 2024 3:24 PM

To: Zimmerman, Robert <rzimmerman@smbb.com>; Guevara, Camila <cguevara@smbb.com>; LPJUKSIG <LPJUKSIG@littletonpark.com>

Cc: SMBSIG <smbsig@smbb.com>

Subject: RE: Hall v. Sig Sauer- Pltfs 3rd and 4th Discovery Requests

Bob,

You see where what is going? To the extent you are implying that we are somehow being unreasonable, we respectfully disagree.

The Federal Rules of Civil Procedure clearly provide that, “[u]nless otherwise stipulated or ordered by the court, a party may serve on any other party no more than 25 written interrogatories, including all discrete subparts.” Fed. R. Civ. P. 33(a)(1). That said, in going back and looking at the Joint Case Management Plan we filed in this case, we do see that you proposed each party have a limit of 30 written interrogatories. You have served 27 to date, which means Sig is obligated to respond to 3 of the interrogatories in your 4th set of interrogatories. However, given that you drafted the initial draft of the joint case management plan and proposed limiting interrogatories to 30 in this matter (see attached email), we think you will be hard-pressed to tell a judge you now need more than that.

Your invitation for a “renewed” meet and confer is disingenuous. You have sent an email earlier today asking for a meet and confer regarding depositions of Sig witnesses for a previously undisclosed case, which you have now disclosed will be for the Cole matter, not for the Hall case. Thus, you are not “renewing” an invitation to meet and confer on discovery issues related to the Hall case.

Please be advised that Sig objects to any additional interrogatories beyond the 30 allowed under the Joint Case Management Plan filed by the parties. We will respond to the first three interrogatories in the 4th Set of Interrogatories served today, unless you wish to withdraw them and serve a select three.

Kristen

Kristen E. Dennison

Partner

Direct Dial (321) 574-1054 • Mobile (646) 708-4844

kristen.dennison@littletonjoyce.com

Please note: To reduce the quantity of paper coming into our offices, we request that as many communications as possible be through electronic means. Your cooperation is appreciated.

From: Zimmerman, Robert <rzimmerman@smbb.com>

Sent: Thursday, March 21, 2024 2:58 PM

To: Dennison, Kristen E. <kristen.dennison@littletonjoyce.com>; Guevara, Camila <cguevara@smbb.com>; LPJUKSIG <LPJUKSIG@littletonpark.com>

Cc: SMBSIG <smbsig@smbb.com>

Subject: RE: Hall v. Sig Sauer- Pltfs 3rd and 4th Discovery Requests

Thanks. Kristen. We see where this is going. We'll engage the courts. We renew our invitation for a meet and confer Friday or Monday.

Robert W. Zimmerman, Esq.

Partner



One Liberty Place

1650 Market Street, 52nd Floor

Philadelphia, PA 19103

[215-575-3898](tel:215-575-3898) (work) [267-872-3430](tel:267-872-3430) (cell)

<https://www.smbb.com/attorney/robert-w-zimmerman/>

From: Dennison, Kristen E. <kristen.dennison@littletonjoyce.com>

Sent: Thursday, March 21, 2024 2:53 PM

To: Guevara, Camila <cguevara@smbb.com>; LPJUKSIG <LPJUKSIG@littletonpark.com>

Cc: SMBSIG <smbsig@smbb.com>

Subject: RE: Hall v. Sig Sauer- Pltfs 3rd and 4th Discovery Requests

Please note you are well beyond the allowed number of Interrogatories under the federal rules of civil procedure. You exceeded them with the third set of interrogatories. Accordingly, Sig will disregard this fourth set of interrogatories.

Kristen E. Dennison

Partner

Direct Dial (321) 574-1054 • Mobile (646) 708-4844

kristen.dennison@littletonjoyce.com



2460 N Courtenay Pkwy Ste 204 • Merritt Island, FL. 32953

Tel (321) 574-0280 • Fax (321) 574-4054

www.littletonjoyce.com

Please note: To reduce the quantity of paper coming into our offices, we request that as many communications as possible be through electronic means. Your cooperation is appreciated.

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended

recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

From: Guevara, Camila <cguevara@smbb.com>

Sent: Thursday, March 21, 2024 2:51 PM

To: LPJUKSIG <LPJUKSIG@littletonpark.com>

Cc: SMBSIG <smbsig@smbb.com>

Subject: Hall v. Sig Sauer- Pltfs 3rd and 4th Discovery Requests

Counselors,

Attached please find Plaintiffs' Third Set of Requests for Production and Admissions dated for March 21, 2024, in regards to the above referenced matter.

Attached please find Plaintiffs' Fourth Set of Interrogatories dated for March 21, 2024, in regards to the above referenced matter.

Please respond according to the Rules of the Court. A hard copy will not follow.

Thank you!

Camila Guevara

Paralegal



One Liberty Place, 1650 Market Street, 52nd Floor,
Philadelphia, PA 19103

+1 215-606-3575 (office) | 215-496-0999 (fax)

cguevara@smbb.com | www.smbb.com

Disclaimer: This e-mail message is intended only for the personal and confidential use of the intended recipients. This message may contain privileged attorney-client communication. If you have received this message in error, any review or dissemination is strictly prohibited. Please notify us immediately by e-mail and delete the original message.
